



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

SEP 18 2018

Dr. Robert H. Bedoukian
Bedoukian Research, Inc.
21 Finance Drive
Danbury, CT 06810

Re: Clean Air Act Reporting Requirement

Dear Dr. Bedoukian:

The United States Environmental Protection Agency ("EPA") is evaluating whether Bedoukian Research, Inc. ("Bedoukian"), located at 21 Finance Drive, Danbury, Connecticut (the "Facility"), is in compliance with certain regulations under the Clean Air Act ("CAA" or "Act") governing chemical manufacturing.

Section 114(a)(1) of the Act, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require any person who owns or operates any emission source to establish and maintain records, make reports, sample emissions, and provide such other information as may reasonably be required. In particular, EPA is evaluating the facility's compliance with the National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources, found at 40 C.F.R. Part 63, Subpart VVVVVV ("Subpart 6V").

Reporting Requirement

Within 45 calendar days of receiving this letter, Bedoukian is required to respond to the following:

1. For all chemicals and compounds listed in Attachment 1 and used as feedstock, or generated as a product or byproduct at the facility, provide the following information:
 - a. Name of the chemical or compound;
 - b. Material Safety Data Sheet or Safety Data Sheet for the chemical or compound;
 - c. What the chemical or compound is used for and when was it first used for that purpose;
 - d. The concentration (percent by weight) of the chemical or compound; and

- e. The quantity (gallons or pounds) of the chemical or compound purchased or produced on an annual basis for the period 2015 through 2017.
2. For all hazardous air pollutants (“HAPs”), as defined in CAA Section 112(b) and Subpart 6V, emitted at the facility for the period 2015 through 2017, provide:
 - a. An itemized list describing the quantity of uncontrolled organic HAP emissions in pounds per year, including the method of calculation; and
 - b. An itemized list describing the quantity of uncontrolled metal HAP emissions in pounds per year, including the method of calculation.
3. For the Circul-Air activated carbon beds (ID Number: HDS-100C-12) located at the facility, provide the following information in Microsoft Excel Spreadsheet format or equivalent:
 - a. The removal efficiency of each bed, including any data, calculations, operating parameter ranges or performance guarantees provided by the manufacturer;
 - b. The manufacturer’s recommended carbon bed desorption/regeneration frequency, based on site-specific operating conditions;
 - c. The manufacturer’s recommended operating pressure drop range across each bed: 1) when online and 2) when being regenerated.
 - d. Quarterly records of pressure drop across each bed in each mode (i.e., when online and when being regenerated) for the last three years;
 - e. Any records of deviations from the maximum exhaust temperature in adsorption mode¹ for the last three years, for each bed; and
 - f. Any records of deviations from the permitted back flush temperature requirements² for the last three years, for each bed.
4. For the NAO vertical regenerative thermal oxidizer (Model Number: NVTO-4S) located at the facility, provide:
 - a. The removal efficiency of the oxidizer, including any data, calculations, recommended operating parameter ranges or performance guarantees provided by the manufacturer; and
 - b. Any records of deviations from the minimum combustion chamber temperature of the oxidizer³ for the last three years.

Be aware that if Bedoukian does not provide the information required in this Reporting Requirement in a timely manner, EPA may order it to comply and may assess monetary penalties under Section 113 of the Clean Air Act. Federal law also establishes criminal penalties for providing false information to EPA. This letter is not subject to Office of Management and Budget review pursuant to the Paperwork Reduction Act, 44 U.S.C. Chapter 35.

¹ Note that CT DEEP Permit Number 044-215-0107 defines the maximum exhaust temperature as 110°F.

² Note that CT DEEP Permit Number 044-215-0107 defines the Initial Range as 70-110°F; the Final Maximum as 200°F; and the Maximum Increase Rate as 1.5°F/min.

³ Note that CT DEEP Permit Number 044-215-0107 defines the minimum combustion chamber temperature as 1,500°F.

You may assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in 40 CFR Part 2, Subpart B. Note that certain categories of information, such as emission data, are not properly the subject of such a claim. If no such claim accompanies the information when EPA receives it, EPA may make the information available to the public without further notice to you. Please be aware that the State of Connecticut may have separate procedures for claims of business confidentiality.

Provide the above-required information to:


Tim Conway, Acting Director
Office of Environmental Stewardship
US EPA Region 1
Mail Code OES04-2
5 Post Office Square Suite 100
Boston, Massachusetts, 02109-3912
Attn: Darren Fortescue

AND to:

Ric Pirolli, Director
Bureau of Air Management, Planning and Standards Division
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106-5127
Attn: Mark Potash

If you have any questions regarding this Reporting Requirement, please contact Darren Fortescue at (617) 918-1162, or have your attorney call Tom Olivier at (617) 918-1737.

Sincerely,


Tim Conway, Acting Director
Office of Environmental Stewardship

cc: Ric Pirolli, CT DEEP

Attachment 1: Target Chemicals and Compounds

| Type of HAP | Chemical name | CAS No. |
|----------------------|------------------------|---------|
| 1. Organic compounds | a. 1,3-butadiene | 106990 |
| | b. 1,3-dichloropropene | 542756 |
| | c. Acetaldehyde | 75070 |
| | d. Chloroform | 67663 |
| | e. Ethylene dichloride | 107062 |
| | f. Hexachlorobenzene | 118741 |
| | g. Methylene chloride | 75092 |
| | h. Quinoline | 91225 |
| 2. Metal compounds | a. Arsenic compounds | |
| | b. Cadmium compounds | |
| | c. Chromium compounds | |
| | d. Lead compounds | |
| | e. Manganese compounds | |
| | f. Nickel compounds | |
| 3. Others | a. Hydrazine | 302012 |